Hampshire & Isle of Wight Wildlife Trust

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Consultation response: Future Portsmouth Plan – Local Plan Scoping

Hampshire & Isle of Wight Wildlife Trust welcomes the opportunity to respond to Portsmouth City Council's Local Plan Scoping Consultation.

The Trust is an independent charity founded in 1961 and part of The Wildlife Trusts movement. Locally, we have more than 29,500 members and manage around 5,000 hectares of land for wildlife across Hampshire and the Isle of Wight.

We have been a key partner in the development of the Hampshire and Isle of Wight Local Nature Recovery Strategies (LNRSs), providing ecological evidence, mapping opportunities for nature-based solutions and supporting community engagement. We are now helping to drive implementation through local restoration projects, partnership working and ambitious place-based programmes. Our Wilder 2030 strategy can be found here: https://www.hiwwt.org.uk/our-strategy.

Nature recovery should be a central strategic priority within Portsmouth's Local Plan. It should be embedded throughout the plan's vision, objectives, spatial strategy, site allocations and development management policies, helping to meet housing, infrastructure and economic needs while strengthening climate resilience, public health, ecological networks and local prosperity.

Strategic Planning Context

Planning is one of the most important tools available to shape the future of places and communities. To achieve truly sustainable development, nature must be recognised as critical infrastructure that underpins healthy communities, climate resilience, economic prosperity and quality of life.

The preparation of a new Local Plan comes at a pivotal time, alongside planning reform, devolution and the implementation of Local Nature Recovery Strategies. Together, these changes create a significant opportunity to align growth with environmental capacity, ensuring that development contributes positively to nature recovery and long-term resilience across Hampshire and the Solent.

We are keen to work constructively with Portsmouth City Council throughout the plan-making process by providing ecological expertise, supporting stakeholder engagement and helping to identify practical solutions that deliver benefits for both people and nature.

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A strong Local Plan should treat nature recovery and climate resilience as cross-cutting themes that underpin housing, health, economic growth, transport, heritage and infrastructure. The following recommendations seek to embed these principles consistently across the proposed strategic priorities.

Question 1
Do you think the Imagine Portsmouth 2040 Vision should remain unchanged (other than the 2040 date being changed to 2045) or be amended?

Amend the Vision.

Question 2
If you would like the Vision to be amended, what changes would you suggest?

The Future Portsmouth Plan vision should be strengthened to recognise nature as critical infrastructure that underpins the city's economy, public health, climate resilience, water security, community wellbeing and long-term prosperity. Nature should not be treated solely as an environmental consideration but as a strategic asset that enables sustainable growth and thriving communities.

The vision should commit to creating a climate-resilient and nature-positive city where development contributes to nature recovery, improves access to green and blue infrastructure, strengthens ecological networks and delivers measurable environmental improvements alongside housing, employment and regeneration. Nature-based solutions should be embedded throughout the plan to help address climate change, coastal change, flood risk, coastal and flood defences, overheating, air quality, health inequalities and biodiversity loss.

Portsmouth is officially ranked as the most heat-vulnerable city in Britain. A comprehensive Heat Vulnerability Index released by Ordnance Survey (OS), the Met Office, and 4 Earth Intelligence revealed that Portsmouth is the most susceptible to extreme heat today and into the future among 71 cities analysed.[1] Portsmouth is at extreme risk as Europe's only island city built on a low-lying sea-level marsh, facing a unique compounding crisis of intense urban heat and rising sea levels[2,3]:

- The urban heat island effect: Dense buildings, concrete, and asphalt absorb solar radiation during the day and act like giant radiators at night. This keeps the city up to 10°C hotter than the surrounding countryside.[4]
- Lack of green infrastructure: Natural cooling from tree canopy and vegetation is critically missing; 99% of neighbourhoods in Portsmouth have less than 20% tree cover[5].

[1] https://shapingportsmouth.co.uk/portsmouth-britains-most-heat-vulnerable-city/

[2] https://www.portsmouthclimateaction.org.uk/facts

[3]https://www.youtube.com/watch?v=c2r7ZxBk0Ac

[4] https://www.theguardian.com/environment/2026/sep/08/cities-great-britain-most-vulnerable-extreme-heat-revealed

[5] https://groups.friendsoftheearth.uk/near-you/local-authority/portsmouth

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- Socioeconomic vulnerability: The areas most exposed to extreme heat, such as Somerstown, Portsea, Southsea, and Fratton, directly overlap with parts of the city facing the highest levels of deprivation.[6]
- Rising sea levels: Alongside severe heat, the city faces a severe long-term flood threat. Surrounded by water, sea levels around Portsmouth are projected to rise up to 1.1 meters and potentially up to 2 meters by 2100, which has forced a massive £180 million investment into new coastal defences.[7]

Portsmouth's future prosperity depends upon healthy natural systems. The vision should therefore recognise that economic growth, healthy communities and environmental recovery are mutually reinforcing objectives rather than competing priorities. This approach aligns with growing recognition that natural capital is fundamental to long-term growth, resilience and quality of life. Given Portsmouth's exposure to extreme heat and rising sea levels, compounded by limited tree cover and unequal vulnerability across communities, it is imperative that the vision places climate resilience and nature recovery at its heart, so that future growth helps reduce these risks rather than worsen them.

Question 3
Do you agree with the key issues and priorities for homes for the Future Portsmouth Plan?

Somewhat

Question 4
Do you have any suggestions for any further local housing key issues and priorities that should be addressed in the Future Portsmouth Plan?

We do not consider the identified issues and priorities sufficiently recognise the environmental capacity for development within Portsmouth nor the role of natural capital in supporting sustainable growth.

An additional priority should be the delivery of growth within the capacity of both natural and built infrastructure. Housing delivery should be guided by an infrastructure and natural capital capacity-led approach, whereby development is directed towards locations where sufficient built infrastructure, environmental capacity, natural capital resilience and ecosystem functionality can be demonstrated, whilst avoiding or reducing growth pressures in locations where critical natural assets, ecological networks, water resources or environmental systems are already constrained or would be significantly harmed. This reflects the approach recently advocated by Winchester City Council through its recognition of natural capital as strategic critical infrastructure.

This should include consideration of:
- Water availability and long-term water security;
- Wastewater treatment and environmental capacity;
- Flood risk, drainage and catchment resilience;
- Access to nature re: recreation, transport, health and education infrastructure;
- Biodiversity, ecological connectivity and habitat networks;

[6] https://www.dailyecho.co.uk/news/26549944.portsmouth-revealed-vulnerable-extreme-heat/

[7] https://www.portsmouth.gov.uk/services/environmental-health/climate-action/climate-change-resilient-portsmouth

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- Landscape character and natural capital assets;
- Climate adaptation and resilience;
- Carbon sequestration and wider nature-based solutions and ecosystem services.

In summary, housing and employment growth should be directed towards locations where sufficient built and natural infrastructure capacity and environmental resilience can be demonstrated. Growth should be aligned with the capacity of both natural and built systems to support sustainable development, ensuring that new housing and employment contribute positively to nature recovery, climate resilience, healthy communities and long-term economic prosperity.

Portsmouth specifically faces significant climate-related risks that should be recognised as key housing issues. Sea level rise, coastal squeeze, tidal flooding, surface water flooding and coastal erosion are likely to increase as a result of climate change. Growth should therefore be directed towards locations capable of demonstrating long-term resilience to these risks.

Wastewater infrastructure and sewage pollution should also be recognised as a major constraint on growth. Portsmouth Harbour and the wider Solent are already under pressure from nutrient pollution, surface water and agricultural runoff and wastewater discharges. Development should only proceed where wastewater infrastructure has demonstrable capacity and where growth will not worsen pollution or harm designated habitats.

Population projections should also be considered alongside housing targets to ensure that housing numbers are realistic, infrastructure-led and capable of being delivered sustainably.

The plan should also recognise green and blue infrastructure as essential infrastructure. Investment in green infrastructure delivers multiple benefits including sustainable drainage (SuDS), flood risk mitigation, coastal defences, urban cooling, climate adaptation, biodiversity recovery, active travel opportunities, improved air quality, public health benefits and stronger communities, whilst also supporting place making and pride in place. Green and blue infrastructure should therefore be planned alongside housing, transport and utilities rather than treated as an enhancement.

Question 5
Do you agree with the key issues and priorities for economy and employment for the Future Portsmouth Plan?

Somewhat.

Question 6
Do you have any suggestions for any further local economy and employment key issues and priorities that should be addressed in the Future Portsmouth Plan?

Healthy ecosystems and economic development are mutually reinforcing, with nature serving as essential national infrastructure that underpins long-term prosperity. Natural systems manage climate impacts like flooding, extreme heat, and drought while securing food and water supplies. There is £41bn annual economic value from UK nature[8] and, as outlined in Natural England's strategy,

[8] https://www.ons.gov.uk/economy/environmentalaccounts/bulletins/uknaturalcapitalaccounts/2025/pdf

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Recovering Nature for Growth, Health and Security 2025,[9] nature is critical infrastructure and the vital foundation upon which economic prosperity depends. This reflects the findings of the 2021, Dasgupta Review[10] that economies, livelihoods and wellbeing depend upon nature and that economic prosperity is embedded within nature. We recommend that Portsmouth City Council includes this rhetoric to convey the evidence and importance of nature-positive growth and a planning system that drives nature recovery, places value on natural capital as critical infrastructure that forms part of economic growth and supports development within environmental limits. Nature should be recognised as critical infrastructure that underpins economic prosperity, public health, water security, climate adaptation and quality of life. Key issues include biodiversity loss, water scarcity, flood, wildfire and drought risk, climate adaptation, ecological connectivity, access to nature and the need for sustainable infrastructure.

Portsmouth City Council must respond to the continuing decline of wildlife and habitats by embedding nature recovery throughout the Local Plan. Development should support the delivery of the Local Nature Recovery Strategy (LNRS), strengthen ecological networks and contribute to the international commitment to halt nature's decline and protect at least 30% of land for nature by 2030. The NPPF paragraph 3 states that planning decisions must reflect relevant international obligations. The Government recognises the risks biodiversity loss and critical ecosystems collapse could have on the UK's resilience, security and prosperity. Natural England's 2025 Strategy and the 2021 Dasgupta Review identify nature's vital role as the foundation of economic growth. Portsmouth must incorporate climate and nature into strategic growth plans to reflect the reality of the crises for generations now and in the future.

Water availability is becoming a major constraint on growth across Hampshire and the Solent. Future development must be planned alongside sustainable water supply, wastewater treatment and river protection. Growth should not place additional pressure on rivers, seas, wetlands, chalk streams and other sensitive habitats, particularly where drought, abstraction and pollution are already affecting environmental quality. The Environment Agency officially declared a drought across Hampshire in July 2026, following months of record-breaking heatwaves, exceptionally low rainfall and wildfires. Climate change is not a risk of tomorrow; its impacts are already having devastating impacts today. Portsmouth City Council must remain responsive to existing and future needs of residents in the face of climate change.

A healthy natural environment is fundamental to long-term economic success. The Solent's coastal habitats provide the equivalent of over £1.1 billion in environmental benefits every year, according to a study by researchers from the University of Portsmouth and the Plymouth Marine Laboratory.[11] Nature supports tourism, workforce wellbeing, climate resilience, investment and local prosperity. The Council should recognise that environmental enhancement and economic growth are mutually reinforcing rather than competing objectives and that the natural environment forms part of Portsmouth's cultural economy. Portsmouth's unique geography as an "island city" leaves roughly 30% of its area covered by statutory nature conservation designations. The surrounding Solent coastline hosts over 125,000 migratory and overwintering birds annually, drawing species from as far

[9] https://www.gov.uk/government/publications/natural-englands-strategy-recovering-nature-for-growth-health-and-security/natural-englands-strategy-recovering-nature-for-growth-health-and-security

[10] https://www.gov.uk/government/publications/final-report-the-economics-of-biodiversity-the-dasgupta-review

[11] https://www.port.ac.uk/news-events-and-blogs/news/solent-coastal-habitats-provide-crucial-environmental-benefits

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as Siberia and the Arctic. The primary bird habitats, key populations, and top birdwatching spots across Portsmouth showcase this incredible ecological richness. The harbours and mud flats around Portsea Island provide a haven for birdwatching, being among the UK's most important location for a host of migratory over-wintering wildfowl, with Langstone Harbour supporting around 30% of the UK's entire population of Brent Geese that travel from Siberia. [12]

Question 7
Do you agree with the key issues and priorities for infrastructure for the Future Portsmouth Plan?

Somewhat

Question 8
Do you have any suggestions for any further local infrastructure key issues and priorities that should be addressed in the Future Portsmouth Plan?

The infrastructure section should explicitly recognise nature and natural capital as critical infrastructure.
Healthy rivers, wetlands, coastal habitats, parks, green spaces, ecological networks and natural systems provide essential services that support economic prosperity, public health, climate resilience, water security and community wellbeing. These assets should therefore be planned and funded alongside transport, utilities, education and healthcare infrastructure.

Portsmouth is officially ranked as the most heat-vulnerable city in Britain. A comprehensive Heat Vulnerability Index released by Ordnance Survey (OS), the Met Office, and 4 Earth Intelligence revealed that Portsmouth is the most susceptible to extreme heat today and into the future among 71 cities analysed.[13] Portsmouth is at extreme risk as Europe's only island city built on a low-lying sea-level marsh, facing a unique compounding crisis of intense urban heat and rising sea levels[14,15]:

- The urban heat island effect: Dense buildings, concrete, and asphalt absorb solar radiation during the day and act like giant radiators at night. This keeps the city up to 10°C hotter than the surrounding countryside.[16]
- Lack of green infrastructure: Natural cooling from tree canopy and vegetation is critically missing; 99% of neighbourhoods in Portsmouth have less than 20% tree cover[17].
- Socioeconomic vulnerability: The areas most exposed to extreme heat, such as Somerstown, Portsea, Southsea, and Fratton, directly overlap with parts of the city facing the highest levels of deprivation.[18]

[12] https://www.visitportsmouth.co.uk/things-to-do/outdoors/birdwatching/

[13] https://shapingportsmouth.co.uk/portsmouth-britains-most-heat-vulnerable-city/

[14] https://www.portsmouthclimateaction.org.uk/facts

[15]https://www.youtube.com/watch?v=c2r7ZxBk0Ac

[16] https://www.theguardian.com/environment/2026/sep/08/cities-great-britain-most-vulnerable-extreme-heat-revealed

[17] https://groups.friendsoftheearth.uk/near-you/local-authority/portsmouth

[18] https://www.dailyecho.co.uk/news/26549944.portsmouth-revealed-vulnerable-extreme-heat/

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- Rising sea levels: Alongside severe heat, the city faces a severe long-term flood threat. Surrounded by water, sea levels around Portsmouth are projected to rise up to 1.1 meters and potentially up to 2 meters by 2100, which has forced a massive £180 million investment into new coastal defences.[19]

The Infrastructure Delivery Plan should adopt a natural capital and infrastructure capacity-led approach, ensuring development only occurs where both built infrastructure and environmental systems can support growth and future resilience. This should include assessment of:

- Water supply and water security.
- Wastewater treatment capacity.
- Flood and coastal resilience.
- Access to nature.
- Green and blue infrastructure provision.
- Climate adaptation requirements.
- Nature recovery opportunities.

Portsmouth City Council should recognise nature as critical infrastructure and make nature recovery a central priority in its Infrastructure Delivery Plan. Protecting and restoring habitats, expanding tree cover and connecting green and blue spaces should be planned and funded alongside transport, utilities and community facilities to help protect the city against heat, flooding, rising sea levels and water scarcity for the benefit of its residents, nature and long term prosperity and resilience. The Council should use evidence of these risks, gaps in access to nature and the capacity of water and wastewater systems to guide where development takes place and what infrastructure it needs. Investment should prioritise communities facing the greatest risks and those with the least access to green space, bringing together tree planting, sustainable drainage and coastal habitat restoration to support both people and wildlife. The Council should set out who will delivery and funding mechanisms, so that new development is supported by the infrastructure it needs. This approach would support nature recovery and help make Portsmouth a cooler, healthier and more resilient place to live, better equipped to withstand the climate risks facing the city.

Question 9
Do you agree with the key issues and priorities for climate change and flooding for the Future Portsmouth Plan?

Somewhat.

Question 10
Do you have any suggestions for any further local climate change and flooding key issues and priorities that should be addressed in the Future Portsmouth Plan?

The identified issues should be expanded to reflect the full range of climate risks facing Portsmouth. In addition to flooding and sea level rise, the plan should recognise increasing risks from drought, overheating, heatwaves, water scarcity, coastal change, flood risks, wildfires and extreme weather events. Hampshire experienced severe drought conditions during 2026, following record heatwaves and exceptionally low rainfall, demonstrating that climate change is already affecting communities, infrastructure and ecosystems across the region.

[19] https://www.portsmouth.gov.uk/services/environmental-health/climate-action/climate-change-resilient-portsmouth

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- The urban heat island effect: Dense buildings, concrete, and asphalt absorb solar radiation during the day and act like giant radiators at night. This keeps the city up to 10°C hotter than the surrounding countryside.[23]
- Lack of green infrastructure: Natural cooling from tree canopy and vegetation is critically missing; 99% of neighbourhoods in Portsmouth have less than 20% tree cover[24].
- Socioeconomic vulnerability: The areas most exposed to extreme heat, such as Somerstown, Portsea, Southsea, and Fratton, directly overlap with parts of the city facing the highest levels of deprivation.[25]
- Rising sea levels: Alongside severe heat, the city faces a severe long-term flood threat. Surrounded by water, sea levels around Portsmouth are projected to rise up to 1.1 meters and potentially up to 2 meters by 2100, which has forced a massive £180 million investment into new coastal defences.[26]

The Trust is a key partner in the Solent Seascape Project and leads other seagrass restoration projects, including at Farlington Nature Reserve. Working with a partnership of 10 organisations, the Solent Seascape Project seeks to restore a connected network of saltmarsh, seagrass meadows, native oyster beds and nesting bird habitats. This work supports wider seascape recovery, benefits marine and terrestrial wildlife, and helps strengthen Portsmouth's resilience to climate change.

Seagrass restoration delivers multiple benefits and should form part of an integrated approach to restoring connected freshwater, coastal and marine environments. Seagrasses are the only flowering plants adapted to life fully submerged in seawater, they capture and store carbon, including in the sediments beneath their meadows. Their rhizomes and roots help stabilise the seabed, while their leaves slow water movement and trap sediment, sequestering carbon and helping to reduce coastal erosion. Seagrass meadows also provide nursery habitats for commercially important fish and support a wide range of wildlife, including seahorses, wading birds and Brent geese. The Trust's restoration work supports research at the University of Portsmouth's Institute of Marine Sciences and involves more than 500 people across its Solent projects. The Future Portsmouth Plan should recognise Farlington and the wider network of seagrass and coastal habitats as important natural

[20] https://shapingportsmouth.co.uk/portsmouth-britains-most-heat-vulnerable-city/

[21] https://www.portsmouthclimateaction.org.uk/facts

[22]https://www.youtube.com/watch?v=c2r7ZxBk0Ac

[23] https://www.theguardian.com/environment/2026/sep/08/cities-great-britain-most-vulnerable-extreme-heat-revealed

[24] https://groups.friendsoftheearth.uk/near-you/local-authority/portsmouth

[25] https://www.dailyecho.co.uk/news/26549944.portsmouth-revealed-vulnerable-extreme-heat/

[26] https://www.portsmouth.gov.uk/services/environmental-health/climate-action/climate-change-resilient-portsmouth

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assets, supporting their protection and restoration as part of the city's long-term climate resilience strategy.

Water quality is another significant consideration. Increased development can place additional pressure on sensitive water environments through wastewater discharges, nutrient loading and increased surface water runoff. The NPPF states that development should, wherever possible, contribute to improving local environmental conditions, including water quality, especially in relation to sensitive water bodies such as chalk streams (DP3.2c; P3.2f; F8.1; N2.1e). Strategic land and infrastructure provision within the Local Plan can support nutrient mitigation, wetland creation, natural flood management and catchment-scale nature recovery initiatives which both protect and enhance water quality. Hampshire and Isle of Wight Wildlife Trust is well positioned to deliver biodiversity net gain and mitigation for nitrates or carbon, prioritising significant added value. Nutrient neutrality delivery schemes should be encouraged to go beyond offsetting and secure nutrient reduction.

Nature-based solutions should form a central component of the climate strategy. Measures such as habitat restoration, urban tree planting, green roofs, sustainable drainage systems, wetland creation, multifunctional green infrastructure and coastal habitat restoration can simultaneously address climate adaptation, climate mitigation and biodiversity recovery, alongside other benefits nature offers for health, wellbeing, community and economic resilience.

The plan should also recognise that drought and water stress are becoming significant constraints on growth. Development should be supported by ambitious water efficiency measures, resilient water infrastructure and nature-based approaches to water management. Growth should not increase pressure on already stressed water environments.

Question 11
Do you agree with the key issues and priorities for the natural environment for the Future Portsmouth Plan?

Somewhat.

Question 12
Do you have any suggestions for any further local natural environment key issues and priorities that should be addressed in the Future Portsmouth Plan?
Nature recovery should be treated as a core strategic priority and embedded throughout the Future Portsmouth Plan. Portsmouth City Council must respond to the continuing decline of wildlife and habitats by embedding nature recovery throughout the Local Plan. Development should support the delivery of the Local Nature Recovery Strategy (LNRS), strengthen ecological networks and contribute to the international commitment to halt nature's decline and protect at least 30% of land for nature by 2030. The NPPF paragraph 3 states that planning decisions must reflect relevant international obligations. The Government recognises the risks biodiversity loss and critical ecosystems collapse could have on the UK's resilience, security and prosperity. Natural England's 2025 Strategy and the 2021 Dasgupta Review identify nature's vital role as the foundation of economic growth. Portsmouth must incorporate climate and nature into strategic growth plans to reflect the reality of the crises for generations now and in the future.

Designated sites

Portsmouth's unique geography as an "island city" leaves roughly 30% of its area covered by statutory nature conservation designations. The surrounding Solent coastline hosts over 125,000 migratory and overwintering birds annually, drawing species from as far as Siberia and the Arctic. The primary bird habitats, key populations, and top birdwatching spots across Portsmouth showcase this incredible ecological richness. Portsmouth's supports nationally and internationally designated coastal and marine environments, including the Solent, Portsmouth Harbour, Chichester and Langstone Harbours, the River Wallington, Portsdown Hill, Farlington Marshes Nature Reserve, Milton Locks Nature Reserve, Eastney Beach amongst others include or support Ramsar sites, Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Sites of Special Scientific Interest (SSSIs) and Local Wildlife Sites (SINCs). Farlington Marshes, one of the Trust's oldest nature reserves, is a coastal wildlife expanse with internationally important populations of wading birds and wildfowl and Milton Locks is the last natural section of coastline on this on this side of Langstone Harbour and is packed full of different habitats and wildlife. These coastal environments support habitats such as mudflats, saltmarshes, seagrass meadows, reedbeds, freshwater lagoons, wet meadows and coastal scrub that support wintering waders and wildfowl across the Solent, including 10% of the global population of dark-bellied Brent geese. Seagrass meadows and saltmarshes store carbon and coastal habitats strengthen flood and climate resilience, and the area supports Portsmouth's distinctive character and birdwatching tourism. Development beyond designated boundaries can nevertheless cause indirect and cumulative harm through recreational disturbance, habitat fragmentation, water-quality pressures and the loss of functionally linked feeding and roosting land.

Water

Water availability is becoming a major constraint on growth across Hampshire and the Solent. Future development must be planned alongside sustainable water supply, wastewater treatment and river protection. Growth should not place additional pressure on rivers, seas, wetlands, chalk streams and other sensitive habitats, particularly where drought, abstraction and pollution are already affecting environmental quality. The Environment Agency officially declared a drought across Hampshire in July 2026, following months of record-breaking heatwaves, exceptionally low rainfall and wildfires. Climate change is not a risk of tomorrow; its impacts are already having devastating impacts today. Portsmouth City Council must remain responsive to existing and future needs of residents in the face of climate change.

The River Wallington is considered a chalk-influenced or chalk stream/river that flows through the South Downs region of Hampshire and drains into Portsmouth Harbour and should be subject to additional protections as a chalk stream. Chalk streams are globally rare, irreplaceable and sensitive water bodies that require particular protection from abstraction, wastewater discharges, nutrient loading, surface-water runoff and pollution. Additional growth should therefore be planned alongside sustainable water supply and wastewater capacity and should avoid harm to, and seek restoration of, the river and its catchment. As a trust we recognise chalk streams as irreplaceable habitats due to their rare, unique and irreplaceable features. We would recommend the protection of chalk streams within policy wording to safeguard these rare habitats.

Housing growth and associated recreational activity can place additional pressure on sensitive coastal habitats. In particular, boat anchoring can damage seagrass meadows, with potentially long-lasting consequences for habitat recovery. The Future Portsmouth Plan should consider these pressures alongside other development impacts and support measures to protect seagrass habitats and manage recreational activity sensitively.

Water pollution is also a concern for seagrass restoration and the wider water environment. Nutrient inputs from wastewater discharges and runoff from housing, roads and agricultural land can contribute to algal growth. Algae can smother seagrass and reduce the light available to it, undermining habitat condition and restoration efforts. Addressing these pressures requires a coordinated approach to wastewater management, surface-water drainage and agricultural runoff. In 2025, 17 sites in Portsmouth were affected by Southern Water sewage discharges, with 337 discharge events lasting a total of 1,523 hours. [27] Any confirmed discharge data should inform assessment of existing pressures and the capacity of wastewater infrastructure to accommodate further growth without worsening environmental conditions.

Additionally, sewage pollution at Farlington has affected the Trust's ability to carry out time-critical and seasonal restoration activities, including seed collection. These concerns demonstrate the importance of improving water quality to support both existing habitats and the practical delivery of nature recovery. The Trust has observed that some seagrass has not produced seeds and is undertaking water-quality testing to investigate possible contributing factors, which could be because of additional nutrients in the water.

Research from the University of Portsmouth also acknowledges the impact of emerging contaminants, including pharmaceutical residues and substances associated with recreational drug use, which raise further concerns about water quality and potential effects on aquatic wildlife. Researchers discuss the impact of one huge sewage pipe in Hampshire's Langstone Harbour which carries the waste of some 400,000 Portsmouth residents. Cocaine, amphetamines and MDMA pass through users' bodies and into the waters and are altering the natural behaviour of some fish with every single marine species that they have looked at so far being full of cocaine.[28]

The Future Portsmouth Plan should therefore address the combined effects of recreational pressure, wastewater discharges, nutrient pollution and runoff on freshwater, coastal and marine habitats. Development should be supported by adequate wastewater capacity, effective pollution prevention and sustainable drainage, alongside protection and restoration of sensitive habitats. These measures should be informed by monitoring and ecological evidence, helping to ensure that growth does not undermine water quality or the delivery of long-term nature recovery.

Birds

Regarding bird disturbance mitigation, Hampshire and Isle of Wight Wildlife Trust lead on the co-ordination of survey work and analysis of data for the Solent Waders and Brent Goose Strategy, working alongside local authorities, including Portsmouth City Council and partners such as Natural England, RSPB, Hampshire County Council and Coastal Partners. The strategy includes spatial mapping of the network highlighting SPA sites, core areas and support areas to support waders and brent geese. These birds are globally significant, heavily protected winter migrants that serve as the definitive iconic symbol of the Solent's cold-weather coastline. More information can be found out about the strategy here: https://solentwbgs.wordpress.com/.

We are also a partner in Bird Aware Solent, a partnership organisation whose aim is to mitigate the additional recreational disturbance to overwintering and breeding birds using the Solent brought about by additional development, through engagement, education, and raising awareness. One of

[27] https://top-of-the-poops.org/place/portsmouth

[28] https://www.thesun.co.uk/news/26957914/cocaine-fish-crabs-high-contraceptive-pill-sewage-spills/

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their key aims is to reduce disturbance of coastal birds by human activity. Increased recreational pressure associated with housing growth can have significant indirect impacts on protected and designated sites. The provision of strategic mitigation land and long-term monitoring and management can reduce disturbance and help ensure compliance with environmental legislation. Providing space for these purposes will help ensure that growth can be accommodated while maintaining the integrity of important habitats, rare and sensitive species, mitigating against impacts of development and recreational disturbance, whilst also supporting long-term environmental resilience and promoting tourism that is unique to the area.

Portsmouth City Council has a responsibility under the Wildlife and Countryside Act 1981 to protect all wild birds, their eggs and active nests. The Council also has a statutory biodiversity duty, which requires it to have regard to the purpose of conserving and enhancing biodiversity in exercising its functions. As such, the Local Plan should take a proactive approach to addressing environmental impacts rather than relying solely on site-level mitigation once development proposals come forward.

The Local Plan must therefore use the Solent Waders and Brent Goose Strategy's mapping of SPA, core and support areas for these globally significant birds, together with the LNRS and other ecological evidence, to steer allocations towards land of least environmental value, apply the mitigation hierarchy and safeguard the integrity of protected sites to align with NPPF policy N1.1a, N1.1c and N2.2. Strategic provision for bird-disturbance mitigation, Suitable Alternative Natural Greenspace (SANG), Strategic Access Management and Monitoring (SAMM), nutrient reduction, green and blue infrastructure and habitat creation and restoration will be essential if new housing and infrastructure are to be accommodated lawfully without eroding the natural systems on which the borough's resilience, wellbeing and long-term prosperity depend. These issues are particularly important to the location, scale and design of future development in Portsmouth because the borough's growth, character and economy is directly linked with the network of internationally and nationally important water and coastal environments.

Nature based solutions

The borough must prepare for increasing risks from flooding, drought, overheating, wildfires and extreme weather. Nature-based solutions such as wetlands, sustainable drainage systems, urban greening, tree planting and habitat restoration can help communities adapt while providing wider environmental and social benefits. Green spaces, rivers, woodlands and other natural assets should be planned and funded as essential infrastructure alongside roads, schools and utilities. High-quality green and blue infrastructure can improve health, reduce flood risk, support biodiversity and enhance the attractiveness of places to live and work.

New homes should be delivered in locations that are sustainable, supported by infrastructure and capable of providing access to nature, active travel opportunities and healthy living environments. Development should create nature-positive neighbourhoods and integrate green and blue infrastructure early into the plan making process. Access to high-quality natural green space should be considered essential community infrastructure. Future development should improve access to nature for all residents, helping to support physical and mental health, reduce inequalities and create stronger, healthier communities. This supports the delivery of multiple NPPF policies across green infrastructure provision, planning for healthy communities and conserving and enhancing the natural environment.

Nature is critical infrastructure that underpins health and wellbeing, economic prosperity, climate resilience, water security and community resilience. Healthy natural systems provide multiple

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benefits including flood regulation, carbon storage, urban cooling, improved air and water quality, access to recreation, mental and physical health benefits and support for biodiversity.

The Local Nature Recovery Strategy
The Local Nature Recovery Strategy should be used as a spatial framework for planning decisions, helping to guide development away from areas of greatest ecological importance whilst directing investment towards habitat restoration, ecological connectivity and nature recovery opportunities.

The plan should prioritise:

- Nature-based solutions.
- Multifunctional green and blue infrastructure.
- Ecological connectivity and nature recovery networks.
- Habitat restoration and creation.
- Urban greening and tree canopy expansion.
- Sustainable drainage systems.
- Coastal habitat restoration.
- Improved access to nature for all communities.
- Protection and enhancement of designated sites and important habitats.

Rather than treating climate change, biodiversity, flood risk, health and economic growth as separate issues, the plan should recognise that they are interconnected and that investment in nature can help deliver positive outcomes across all of these objectives simultaneously. Nature recovery should therefore be embedded throughout the plan's vision, spatial strategy, infrastructure planning and development management policies.

Question 13
Do you agree with the key issues for design, placemaking and heritage for the Future Portsmouth Plan?

Somewhat

Question 14
Do you have any suggestions for any further local design, placemaking and heritage key issues and priorities that should be addressed in the Future Portsmouth Plan?

Placemaking
Town centres play an important role in supporting economic vitality and community wellbeing. Enhancing town, district and local centres should integrate nature into urban environments to improve air quality, reduce urban heat, encourage healthier lifestyles and create more attractive places to live, work and visit.

Natural assets enhance town and district centres through urban greening, tree planting, green infrastructure and public realm improvements that support biodiversity. Green and blue infrastructure also creates attractive, climate-resilient centres that encourage people to spend time, work, visit and live in them, whilst supporting health, wellbeing and access to nature. This evidence is set out in Natural England's Green Infrastructure Planning and Design Guide[29] and supports evidence

[29] https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/Design%20Guide%20-%20Green%20Infrastructure%20Framework.pdf

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regarding Green and Blue Infrastructure and as part of conservation and enhancement of the natural, built and historic environment.

Green spaces are Britons' biggest source of pride in their local areas.[30] Natural England's Nature Towns and Cities initiative outlines how neighbourhoods can be renewed through green infrastructure, supporting health and wellbeing benefits, cutting healthcare costs and boosting economic growth. They outline that:

- Urban green spaces protect communities from climate threats, cooling air by 2-8°C and cutting pollution by up to 22%
- Natural flood management solutions save millions in potential damage costs
- Beyond environmental benefits, these spaces create essential social hubs for connection and recreation
- They revitalise neighbourhoods, attract investment, and build communities that people take pride in.

Historic environment

The historic environment should not be considered in isolation from the natural environment, as many heritage assets are also natural assets too. Opportunities to enhance heritage assets through nature recovery, landscape restoration and multifunctional green infrastructure should be recognised. Nature-based solutions can contribute to the conservation of historic settings whilst delivering wider benefits for
climate resilience, biodiversity and public wellbeing.

Natural England identifies what the historic environment can offer for nature recovery objectives, providing case studies and examples of where historic assets, archaeology sites and landscapes are also natural assets, habitats, often wildlife rich places that can facilitate nature corridors and ecological networks, connecting people to nature and support actions taken to mitigate against climate change and improve soil, water and air quality. [31]

Water efficiency

Water scarcity is a growing strategic risk. Development should anticipate water demand and supply and effectively mitigate impacts favouring ambitious nature-based solutions that deliver multiple benefits, including flood mitigation, nutrient neutrality, nature recovery and climate resilience.

The Local Plan should require ambitious water efficiency standards for new development, particularly given water stress across much of southern England. We recommend that the Local Plan includes a target of 90 litres per person per day or less for new homes, supported by water reuse, sustainable drainage and nature-based approaches to water management.

To compliment the Government's commitment to review Building Regulations in order to prevent new development causing issues with water supply, the Future Homes Hub conducted a review of the options and feasibility of tightening water efficiency regulations with wide-ranging input from across the industry. Its final report recommends a target of 100 litres per person per day by 2030, and 90 in

[30] https://www.moreincommon.org.uk/wp-content/uploads/2026/04/wates-webinar-final.pdf

[31] https://historicengland.org.uk/content/docs/advice/nature-recovery-historic-environment/

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water stressed areas.[32] This would be tightened to 90 as standard by 2035 and 80 litres per person per day in water stressed areas. The feasibility of building to these standards is evidenced in detail, building on previous research and evidence behind such specifications in the former Code for Sustainable Homes. [33]

We hope that you will find our comments helpful and, if you have any questions or wish to discuss these matters further, please do not hesitate to contact us. I also ask that you keep the Trust informed of the progress and outcome of this plan.

Kind regards,
Niam Tickner

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[32] https://irp.cdn-website.com/bdbb2d99/files/uploaded/Water%20Ready_A%20report%20to%20inform%20HM%20Government-s%20roadmap%20for%20water%20efficient%20new%20homes.pdf

[33] https://database.waterwise.org.uk/wp-content/uploads/2019/10/Advice-on-water-efficient-homes-for-England061118.pdf

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